## **REMARKS**

Claims 1-9 stand rejected under 35 U.S.C. § 102 as being anticipated by Masanori et al. ("JP '529"). Claim 1 is the sole independent claim. This rejection is respectfully traversed for the following reasons.

Claim 1 recites in pertinent part, "at least one land formed in a corner region of the outer frame and connected to the outer frame through a connection, said at least one land having a larger area than the land portions." One exemplary embodiment of the present invention is shown in Figure 1A, where the land 103 formed in a corner region of the outer frame has a larger area than the land portions 104, for example. According to one aspect of the present invention, the reinforced land can provide the capability to prevent strain at corner regions of the outer frame and improve the strength of the package between the motherboard and a semiconductor device (e.g., by a solder joint). In addition, the reinforced land can restrain a change in shape and movement of the die pad. In contrast, the corner lands of JP '529 appear to have the same area as the alleged land portions. Indeed, JP '529 appears to be silent as to any need/desire for having larger area lands in the corner regions of the outer frame, let alone suggest doing so. New independent claim 24 is submitted to be patentable for reasons similar to those discussed above with respect to claim 1.

As anticipation under 35 U.S.C. § 102 requires that each and every element of the claim be disclosed, either expressly or inherently (noting that "inherency may not be established by probabilities or possibilities", *Scaltech Inc. v. Retec/Tetra*, 178 F.3d 1378 (Fed. Cir. 1999)), in a single prior art reference, *Akzo N.V. v. U.S. Int'l Trade Commission*, 808 F.2d 1471 (Fed. Cir. 1986), based on the forgoing, it is submitted that JP '529 does not anticipate claims 1 and 24, nor any claim dependent thereon.

**Application No.: 10/689,642** 

Under Federal Circuit guidelines, a dependent claim is nonobvious if the independent claim upon which it depends is allowable because all the limitations of the independent claim are contained in the dependent claims, *Hartness International Inc. v. Simplimatic Engineering Co.*, 819 F.2d at 1100, 1108 (Fed. Cir. 1987). Accordingly, as claims 1 and 24 are patentable for the reasons set forth above, it is respectfully submitted that all claims dependent thereon are also patentable. In addition, it is respectfully submitted that the dependent claims are patentable based on their own merits by adding novel and non-obvious features to the combination.

Based on the foregoing, it is respectfully submitted that all pending claims are patentable over the cited prior art. Accordingly, it is respectfully requested that the rejection under 35 U.S.C. § 102 be withdrawn.

## **CONCLUSION**

Having fully responded to all matters raised in the Office Action, Applicants submit that all claims are in condition for allowance, an indication for which is respectfully solicited. If there are any outstanding issues that might be resolved by an interview or an Examiner's amendment, the Examiner is requested to call Applicants' attorney at the telephone number shown below.

## **Application No.: 10/689,642**

To the extent necessary, a petition for an extension of time under 37 C.F.R. § 1.136 is hereby made. Please charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, to Deposit Account 500417 and please credit any excess fees to such deposit account.

Respectfully submitted,

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8